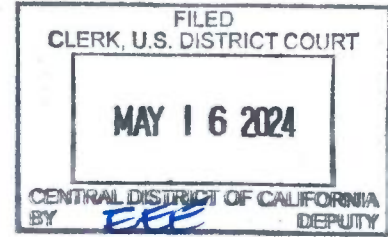


Elida Rodriguez  
 4473 Tweedy Blvd  
 South Gate, CA 90280  
 In pro per



United States District Court  
 For the  
 Central District of California

	)	Civil Action No.
	)	2:24-cv-02418 SPG (PVCx)
Plaintiff: KORTTNEY ELLIOT	)	RESPONSE
	)	
DEFENDANT: ELIDA RODRIGUEZ	)	Trial Date: TBD
	)	Time: TBD
	)	Dept: TBD

TO: The Court in the above-entitled matter, and to Attorneys to Plaintiff,

## **ANSWER OF DEFENDANT Elida Rodriguez TO PLAINTIFF'S COMPLAINT**

Elida Rodriguez ("Defendant"), hereby answers the Complaint of Korttney Elliot ("Plaintiff") as follows:

### **I. GENERAL DENIAL**

Defendant denies each and every allegation, matter, and thing contained in the Complaint, except as expressly admitted herein.

### **II. SPECIFIC ADMISSIONS AND DENIALS**

1. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations and therefore denies them.
2. Defendant admits it is the owner and operator of the business located at 4473 Tweedy Blvd., South Gate, California. Defendant denies any wrongdoing or liability.
3. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations regarding DOES 1 through 10 and therefore denies them.
4. Defendant admits the court has jurisdiction under 28 U.S.C. §§ 1331 and 1343.
5. Defendant admits that pendant jurisdiction is invoked for related state law claims but denies any violation thereof.
6. Defendant denies the factual allegations and violations contained in these paragraphs and asserts a lack of knowledge sufficient to form a belief as to the truth of the remaining allegations.

### III. AFFIRMATIVE DEFENSES

#### 1. Failure to State a Claim

Plaintiff's Complaint fails to state a claim upon which relief can be granted.

#### 2. Standing

Plaintiff lacks standing to bring this lawsuit as Plaintiff did not enter or attempt to enter the business and thus did not suffer an injury in fact.

#### 3. Mootness

Any alleged violations have been remedied or are in the process of being remedied, rendering Plaintiff's claims moot.

#### 4. Compliance with Law

Defendant has complied with all relevant federal, state, and local laws regarding accessibility for persons with disabilities.

#### 5. No Intentional Conduct

Defendant did not intentionally or willfully violate any laws or regulations as alleged in the Complaint.

#### 6. Lack of Knowledge

Defendant lacked actual knowledge of any specific barriers to access and had no intent to discriminate.

#### 7. Undue Burden

Alleged modifications, if required, would impose an undue burden on Defendant.

#### 8. Equivalent Facilitation

Defendant provided equivalent facilitation as permitted under ADA guidelines.

#### 9. Unclean Hands

Plaintiff's claims are barred by the doctrine of unclean hands.

#### 10. Lack of Notice

Defendant did not receive proper notice of the alleged violations prior to the commencement of this lawsuit.

#### 11. Private Parking and Street Parking\*\*

Defendant's business provides private parking in the rear of the premises which is not available to the public. Public parking is provided to all clients through public

street parking in front of the business.

12. No Public Restroom

Defendant's business does not have a public restroom available for customers or visitors.

13. High-Frequency Litigant

Plaintiff is a high-frequency litigant who files numerous lawsuits alleging violations of the ADA and related statutes, which impacts the credibility and legitimacy of Plaintiff's claims.

14. Defective Proof of Service

The proof of service provided by Plaintiff was blank, lacking both the date of service and the identity of the individual who served the paperwork, thereby failing to meet the procedural requirements for proper service of process.

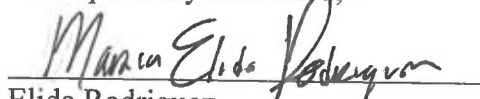
**IV. PRAYER FOR RELIEF**

WHEREFORE, Defendant respectfully requests that this Court:

1. Dismiss the Complaint with prejudice;
2. Award Defendant its costs and fees incurred herein; and
3. Grant such other and further relief as the Court deems just and proper.

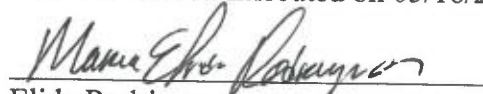
DATED: 05/16/2024

**\*\*Respectfully submitted,\*\***

  
 Elida Rodriguez  
 4473 Tweedy Blvd  
 South Gate, CA 90280  
 In pro per

**Verification**

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on 05/16/2024, at South Gate, CA.

  
 Elida Rodriguez